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March 7, 2022

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Lorna G. Schofield, U.S.D.J.
40 Foley Square, Courtroom 1106
New York, NY 10007-1312

**Re: Edelman v. NYU Langone Health System, et al.
Case No.: 1:21-cv-502 (LGS) (GWG)
MLLG File No.: 209-2020**

Dear Judge Schofield:

This firm represents the Plaintiff, Dr. Sari Edelman (hereinafter “Plaintiff” or “Dr. Edelman”), in the above-referenced case. Plaintiff writes, with the consent of Defendants, to respectfully seek a three (3) week extension of Plaintiff’s deadline to submit opposition papers to Defendants’ motion for summary judgment from March 11, 2022, to April 1, 2022.

Pursuant to this Court’s January 28, 2022, Order (the “Order”),¹ Plaintiff’s deadline to submit opposition papers to Defendants’ motion for summary judgment is March 11, 2022. In the event that Plaintiff’s requested extension of time to April 1, 2022, is granted, Defendants respectfully request, on consent of Plaintiff, a reciprocal three (3) week extension of the deadline to submit reply papers in further support of their motion for summary judgment from April 15, 2022 (calculated by the Defendants based on the timing in the current briefing schedule) to and including May 6, 2022.

Pursuant to ¶ I(B)(2) of this Court’s Individual Rules and Civil Procedures, there have been no previous requests for an extension of any deadline in the Order.

The reason for the request is that, among other deadlines and appearances, Plaintiff’s counsel will be arguing before the United States Court of Appeals for the Second Circuit on Tuesday, March 8, 2022, and conducting an all-day mediation outside of the office on Friday, March 11, 2022, and thus needs additional time to complete Plaintiff’s opposition papers. Similarly, on Defendants’ end, the proposed reply deadline contemplates and seeks to avoid conflicts with three (3) hearings that have been scheduled between April 1, 2022, and April 15, 2022, as well as the religious holidays in mid-April.

¹ See Docket Entry 101.

Hon. Lorna G. Schofield, U.S.D.J.

March 7, 2022

Page | 2

The parties therefore respectfully submit that there is therefore good cause for granting the requested extensions. See Fed. R. Civ. P. 6(b)(1)(A). Accordingly, Plaintiff's letter motion to amend the briefing schedule for her opposition papers and Defendants' request to amend same for their reply papers in further support should be granted.

Dated: Lake Success, New York
March 7, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

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cc: Defendants (via ECF).